



# CARTWRIGHT COMMUNICATION TECHNOLOGY, INC.

VOICE & DATA COMMUNICATION SYSTEMS

March 25, 2003

The Honorable Michael K. Powell  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 8-B201  
Washington, DC 20554

Re: Amendment of Sections 90.20 and 90.175 of the Commission's Rules for  
Frequency Coordination of Public Safety Frequencies in the Private Land Mobile  
Radio Below-470 MHz Band; WT Docket No. 02-285

Dear Mr. Chairman:

Last year, the Association of Public Safety Officials, International, filed a Petition for Rulemaking, which sought to expand competitive frequency coordination in the public safety pool below 512 MHz. After the Commission issued a *Notice of Proposed Rulemaking* concerning APCO's Petition, the Industrial Telecommunications Association suggested that the Commission expand coordination competition to all public safety and industrial/business frequency coordinators. Now, APCO has formed a "consensus group" among public safety coordinators to maintain their respective monopolies, simply promising faster service through a private contract with other public safety coordinators.

As a two-way radio dealer of 33+ years that supplies both public safety and industrial/business applicants throughout Tennessee with critical communications equipment, I support ITA's proposal for enhanced competition among frequency coordinators. Coordination prices for public safety licensees, many of which are non-profit volunteer organizations, are much higher than industrial/business coordination, often times because public safety applications require concurrence, and thus additional frequency coordination fees, from another public safety coordinator. In addition to high coordination rates, the time associated with public safety coordination is entirely too slow for organizations that need effective radio communications immediately. Unfortunately, the need for approval by a Local APCO Coordinator needlessly complicates the public safety coordination process.

Opening up competition, as was done in the industrial/business pool, to additional competition and eliminating the need for concurrence will drive prices down and reduce the amount of time necessary to coordinate public safety applications. With this in mind, Cartwright Communication Technology supports ITA's proposal for open coordination competition among all public safety and industrial/business coordinators.

Sincerely,

Louis Cartwright  
President